

Exhibit B

From: Robert Sabido
To: [Yoel Hanohov](mailto:Yoel.Hanohov@toddflaw.com); [Todd Friedman](mailto:Todd.Friedman@toddflaw.com); [Erika Campany](mailto:Erika.Campany@toddflaw.com)
Cc: ["Joshua Trigsted"](mailto:'Joshua Trigsted'@attorneysforconsumers.com); [Adrian Bacon](mailto:Adrian.Bacon@toddflaw.com); [Timothy J. Fransen](mailto:Timothy.J.Fransen@toddflaw.com)
Subject: RE: Kramer, Shasta v. Ray Klein Inc.
Date: Tuesday, February 06, 2018 7:48:23 PM

Yoel,

We are sorry to hear about Ms. Kramer's passing. No objection to a reasonable extension to respond to defendant's discovery requests under the circumstances.

In the meantime, however, we're not sure how your office can proceed with the litigation without a plaintiff. Please let us know, as soon as possible, what your office's plan is in that regard. Additionally, please specify what documents your office is waiting for in advance of the deposition. As you know, documents have already been produced. Additional documents cannot be produced until a protective order is entered. We previously sent defendant's proposed protective order, but have not received a response.

Thanks.

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From: Yoel Hanohov [mailto:Yoel.Hanohov@toddflaw.com]
Sent: Monday, February 5, 2018 2:28 PM
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<jtrigsted@attorneysforconsumers.com>; Adrian Bacon <abacon@toddflaw.com>; Timothy J. Fransen <tfransen@cosgravelaw.com>
Subject: RE: Kramer, Shasta v. Ray Klein Inc.

Robert:

Our deadline to respond to your discovery requests is today. However, we believe that Ms. Kramer has unfortunately just recently passed away, and we will not be able to provide substantive responses at this time. We will need some time to get in contact with her next of kin and discuss this